



**Outside Edge Theatre Company**

# **Safeguarding Policy and Operations Procedures**

**November 2025**

# Outside Edge Theatre Company

## SAFEGUARDING POLICY & OPERATIONAL PROCEDURES

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# 1. POLICY STATEMENT

Outside Edge Theatre Company (herein referred to as 'OETC') has a duty of care to safeguard from harm all children, young people and vulnerable adults with whom it interacts. Vulnerable Adults occupy a central place within OETC and our work. We strongly believe that all people have the right to be treated fairly, justly and have the right to freedom from abuse and harm.

This policy details the legal requirements, organisational procedures and best practice as applicable to all staff. This policy applies to all OETC staff, including those who work on a volunteer and freelance basis as well as permanent and fixed time staff and OETC's Board of Trustees.

Our policy ensures that all our staff and volunteers are carefully selected and vetted, have the relevant qualifications and experience, and accept responsibility for helping to prevent the abuse of vulnerable adults and children or young people in their care. We aim to offer comprehensive advice to OETC staff members and freelance artists with regards to legal requirements and good practice.

All suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately.

We have procedures in place to address poor practice, and to help any vulnerable adult, child or young person who appears to be at risk, or who appears to be a victim of abuse. We will offer help and support when a vulnerable adult, child or young person tells us that they are affected by these issues. We will work extensively with external agencies such as the Local Authority, NSPCC and the police to ensure as far as possible that people are protected from harm and abuse.

The terms "Adult", "Adults" and "Service User", are used to refer to anyone over the age of 18. The terms "young person", "young people" are used to refer to any OETC participant between the ages of 16 - 25 when engaged in specific projects targeted at young people. The terms "child", "children", are used to refer to anyone under the age of 18.

We will not tolerate bullying. Incidents of bullying will be investigated and treated seriously. Action will be taken to stop the bullying.

The CEO and Artistic Director of OETC is: Matt Steinberg

The Designated Safeguarding Officer is: Adam Line

The Designated Safeguarding Ambassador is: Matt Steinberg

The Lead Trustee for Safeguarding: Teresa Wirz

Contact details for the Safeguarding team can be found on page 21.

## 2. STAFF ROLES & RESPONSIBILITIES

The **Designated Safeguarding Officer** leads upon policy development and reporting, including:

- Reviewing and updating the organisation's safeguarding policy on an annual basis or when necessary
- Leading upon contact with Local Authority Social Services in the event that a adult/child/young person is at risk of harm

- Managing complaints about poor practice and allegations against staff/volunteers
- Referring relevant issues of safeguarding to the Board of Trustees for consideration. This may include policy changes, issues relating to OETC staff, or major safeguarding incidents.
- Collecting monitoring data on all safeguarding activities across the organisation
- Ensuring safer recruitment procedure and promoting safeguarding across the organisation
- Acting as a “front-line” point of contact for any persons concerned about the welfare of a adult /child/young person
- Modelling best practice when it comes to safeguarding amongst staff/volunteers/participants
- Providing guidance to staff concerned about a Vulnerable Adult / Child protection issue
- Keeping accurate records of concerns about vulnerable adults, children and young people and actions taken

The **Designated Safeguarding Ambassador** leads upon policy implementation, including:

- Contributing to the review and update of the safeguarding policy and procedures
- Acting as a “front-line” point of contact for any persons concerned about the welfare of a adult /child/young person when the DSO is unavailable
- Updating the Designated Safeguarding Officer upon any issues raised/reported in sessions during their absence
- Modelling best practice when it comes to safeguarding amongst staff/volunteers/participants
- Contributing to the review and update of the safeguarding policy and procedures
- Providing guidance to staff concerned about a Vulnerable Adult/ child protection issue
- Keeping accurate records of concerns about vulnerable adults, children and young people and actions taken in DSO’s absence.

The **Lead Trustee for Safeguarding** leads upon policy and procedure oversight, including:

- Ensuring that policy and procedures are fully implemented and followed by all staff/volunteers
- Being kept informed of all serious safeguarding incident forms and feeding in as necessary
- Reporting to Trustees upon any observations and/or findings concerning safeguarding

All members of **staff/volunteers** have a responsibility to safeguard vulnerable adults, children and young people from harm, including:

- Being vigilant of the signs that may indicate a child/young person is experiencing harm or is at risk of harm
- Report any disclosures or concerns, as soon as possible, to the Designated Safeguarding Officer or the Designated Safeguarding Ambassador in the DSO's absence
- When taking a disclosure from an adult/ child/young person remembering not to ask any leading questions

Staff responsibilities will be detailed in reporting procedures flowchart (see appendix 4).

### **3. RECRUITMENT, SELECTION AND TRAINING OF STAFF**

#### **3.1 SAFER RECRUITMENT & SELECTION OF STAFF**

Safe recruitment and selection practice is vital in safeguarding and protecting adults, children and young people. OETC recognises and takes seriously its responsibility to adopt practice which minimises risk to the adults, vulnerable adults, children and young people by ensuring that measures are in place through this practice to deter, reject or identify people who might abuse vulnerable adults, vulnerable adults, children and young people or who are unsuitable to work with them. The safety and well-being of adults, vulnerable adults, children and young people is borne in mind at all times throughout the recruitment and selection process. OETC has adopted the NSPCC Value Based Interview and Recruitment Policy. In accordance with this, OETC will ensure that:

- Appropriate checks are carried out on new staff/volunteers
- The safety of vulnerable adults, children and young people is explicitly stated in job descriptions and person specifications (when working with vulnerable adults/children or young people)
- CV's are requested for staff and Interviewers question and interrogate gaps in employment history through to the interview process
- OETC carries out enhanced Disclosure and Barring Service (DBS) for relevant roles
- Whenever a new Freelancer / Associate Artist joins OETC, there will always be an extra staff member or trained Peer Volunteer in the room who has knowledge and experience of the OETC ethos and good practice
- OETC has an open door policy when rehearsing or during a development process, this means at any time a full time member of staff may enter space to observe the session. This offers transparency and an opportunity to feedback and reflect on good practice.
- OETC will ensure that at least one member of any interview panel has completed Level 3 Safeguarding Training. Any appointments with substantial access to vulnerable adults, children and young people will be subject to a reference form (see appendix 7).

- OETC will ensure that permanent and freelance staff are carefully selected, trained to the appropriate Safeguarding Level (as outlined below in Section 3.2) and supervised to provide a safe environment for all vulnerable adults, children and young people, by observing the following principles:

**Permanent staff:**

- Applicants will be required to complete an application form in which they specify safeguarding training.
- Shortlisted candidates will be interviewed by a panel of at least two staff/Trustees;
- Selected candidates will be required to provide at least two written references;
- Staff will undergo any safeguarding training required and will require a probationary period.

**Freelance staff:**

- Persons will meet with OETC’s Participation and Operations Manager and/or Artistic Director / CEO, in advance of an employment offer;
- Where relevant written references will be obtained to confirm their suitability for working with vulnerable adults, children and young people;
- Staff will be monitored by OETC’s Participation and Operations Manager who will offer appropriate advice/guidance.

**3.2 STAFF TRAINING**

OETC has two full time members of staff who are trained to Level 3 in adult and child safeguarding.

Training in Safeguarding is informed by NHS England’s Guidance on ‘Safeguarding Adults’ <https://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf> and Working Together to Safeguard Children Guidance (2010). It is organised into different levels of knowledge and skills. The level required depends on the degree of contact that an individual has with vulnerable adults, vulnerable adults, children and young people and the role they play. Our policy details how these levels are applicable to key OETC staff members:

<b>Group</b>	<b>Applicable OETC Staff</b>	<b>Training Required</b>
<p>Group 1 comprises staff/volunteers with limited contact with vulnerable adults, children and young people.</p> <p>They have responsibility to contribute to promote the welfare of vulnerable adults,</p>	<p>Trustees Masterclass tutors</p>	<p>Optional 1.5-hour OETC bespoke non accredited safeguarding briefing, including Level 1 equivalent information.</p>

children and young people but do not have specific safeguarding organisational responsibilities.		
<p>Group 2 comprises staff/volunteers who work regularly with vulnerable adults, children and young people. These staff will have professional and/or organisational responsibility for safeguarding and promoting the welfare of vulnerable adults, children and young people.</p> <p>Group 2 requires the skills to respond appropriately to Group 1 staff that may approach them with concerns about the welfare of a child/young person.</p>	<p>Freelance staff and Volunteers who work regularly with vulnerable adults or young people, including Regular Facilitators, Project-based artists and creatives, Peer Volunteers.</p>	<p>1.5-hour OETC bespoke non accredited Safeguarding briefing or Level 3 Safeguarding Training Course Delivered by a Qualified Safeguarding Instructor</p>
<p>Group 3 comprises staff who work predominantly with vulnerable adults, children and young people. They have a substantial degree of personal responsibility and autonomy to act on the welfare concerns of vulnerable adults, children and young people.</p>	<p>OETC Fixed Term and Permanent Staff Members</p>	<p>Level 3 Safeguarding Training accredited Course</p>
<p>Group 4 are core OETC staff who are responsible for delivering internal safeguarding briefings and the named, nominated and designated officers for child protection and their deputies in all services and agencies.</p>	<p>Designated Safeguarding Officer CEO and Artistic Director Trustee with Responsibility for Safeguarding Designated Safeguarding Ambassador</p>	<p>Level 3 Award in Safeguarding vulnerable adults and protecting children, young people.</p>

Note: Persons in Groups 1 - 2 who have completed a Level 1 Course or in-House Training should update their knowledge every 2-3 years with a refresher course. OETC provides Safeguarding Training in-house or at Level 1 when on-boarding new freelance members of staff and before every large-scale project.

The level 3 Safeguarding Training does not expire; however knowledge should be refreshed through regular CPD and subscription to updates such as CASPAR. Good practice would be for this training to be refreshed every 3 years.

OETC will keep a record of all Safeguarding Training undertaken by both freelance and permanent staff and will remind them when they are due to attend further training. OETC asks all contracted staff to take responsibility for their own training and development and to seek further training as and when required.

## **4. IDENTIFYING & RESPONDING TO CONCERNS ABOUT A VULNERABLE ADULT/CHILD/YOUNG PERSON**

At times OETC staff may have to respond to concerns about the welfare of vulnerable adults, children and young people. This could relate to the actual or alleged harm of a vulnerable adult or child/young person. Alternatively a vulnerable adult, child/young person we are working with may disclose abuse directly to you. This section provides information and guidelines on our procedures in these situations.

### **ADULT SAFEGUARDING**

Within the context of OETC and its activities, OETC considers all Service Users to be 'Vulnerable Adults' due to the nature of the client group and their specific needs and requirements.

In the context of the legislation, specific adult safeguarding duties apply to any adult who:

- has care and support needs, and
- is experiencing, or is at risk of, abuse or neglect, and
- is unable to protect themselves from either the risk of, or the experience of abuse or neglect, because of those needs.

Within the scope of this definition are:

- All adults who meet the above criteria regardless of their mental capacity to make decisions about their own safety or other decisions relating to safeguarding processes and activities;
- Adults who manage their own care and support through personal or health budgets.

This policy reflects **The Care Act 2014 and Guidance**, which states that Adult safeguarding:

- Is person led
- Engages the person from the start, throughout and at the end to address their needs
- Is outcome focused
- Is based upon a community approach from all partners and providers

Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of adults. Staff should work together in partnership with adults so that they are:

- Safe and able to protect themselves from abuse and neglect;
- Treated fairly and with dignity and respect;
- Protected when they need to be;
- Able easily to get the support, protection and services that they need.

The aims of Adult Safeguarding are to:

- Stop abuse or neglect wherever possible;
- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs;
- Safeguard adults in a way that supports them in making choices and having control about how they want to live;
- Promote an approach that concentrates on improving life for the adults concerned;
- Raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect;
- Provide information and support in accessible ways to help adults understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult; and
- Address what has caused the abuse.

### **Principles of Adult Safeguarding:**

- **Empowerment**

People are supported and encouraged to make their own decisions and informed consent.

“I am asked what I want as the outcomes from the safeguarding process and this directly informs what happens.”

- **Prevention**

It is better to take action before harm occurs.

“I receive clear and simple information about what abuse is. I know how to recognise the signs, and I know what I can do to seek help.”

- **Proportionality**

The least intrusive response appropriate to the risk presented.

“I am sure that the professionals will work in my interest and they will only get involved as much as is necessary.”

- **Protection**

Support and representation for those in greatest need.

“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”

- **Partnership**

Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”

- **Accountability**

Accountability and transparency in delivering safeguarding.

“I understand the role of everyone involved in my life and so do they.”

#### **4.1 IDENTIFYING TYPES & INDICATORS OF ABUSE**

In order to effectively protect vulnerable adults, children and young people against harm all staff should be familiar with the various types and key signs of abuse. The Government’s *Working Together to Safeguard Children* (2010) details four key types of abuse:

- Physical
- Sexual
- Domestic Abuse
- Psychological or Emotional;
- Neglect (Including Self Neglect)
- Financial or Material Abuse
- Organisational or Institutional Abuse
- Modern Slavery

- Discriminatory Abuse

All staff are required to acquaint themselves with indicators of abuse (please see appendix 3).

## **4.2 RADICALISATION**

OETC recognises the positive contribution it can make towards protecting vulnerable adults, children and young people from radicalisation to violent extremism. OETC will continue to empower vulnerable adults, children and young people to create communities that are resilient to extremism and support the wellbeing of particular adults, children and young people who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature including electronic material accessed via the internet and communication such as e-mail and text messages
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If staff have any significant concerns about a vulnerable adult, child/young person beginning to support terrorism and/or violent extremism, they should discuss this with the Designated Safeguarding Officer or the Designated Safeguarding Ambassador immediately.

## **4.3 FEMALE GENITAL MUTILATION**

It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad or aid or abet someone to take a child out of the country to undergo the procedure – Female Genital Mutilation Act 2003. Despite the harm it causes, FGM practising communities consider it acceptable to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The average age is thought to be 6 - 12 years but it is also thought that the age at which girls are mutilated is dropping.

Although the age of the vulnerable adults, children and young people with whom OETC engages is such that they are not necessarily in the 'high risk' category for FGM, a child/young person may disclose that she is at risk of FGM, has suffered FGM or that she has a sister or family member who is at risk of mutilation.

Staff should be alert to the following indicators:

- The family comes from a community that is known to practise FGM
- A child/young person may talk about a long holiday to a country where the practice is prevalent
- A child/young person may confide that they or a sister or family member is to have a 'special procedure' or to attend a special occasion
- A child/young person may request help from a teacher or another adult
- Any girl/young person born to a woman who has suffered FGM or has a sister or relative who has been subjected to FGM must be considered to be at potential risk

Any information or concern about a child/young person or member of their family being at risk of FGM must be reported to the Designated Safeguarding Officer or the Designated Safeguarding Ambassador as matter of urgency. This may be treated as an immediate child protection referral to the child/young person's home borough.

#### **4.4 SELF-NEGLECT**

There is no single operational definition of self-neglect however, the Care Act makes clear that it can come within the statutory definition of abuse or neglect, if the individual concerned has care and support needs and is unable to protect him or herself. The Department of Health (2014), defines it as, 'a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding'.

However revised Care Act guidance (published March 2016) states that it should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

##### **4.4.1 Response to self-neglect and hoarding**

Given the complex and diverse nature of self-neglect and hoarding, responses by a range of organisations are likely to be more effective than a single agency response with particular reference to housing providers. It is important to recognise that assessments of self-neglect and hoarding are grounded in, and influenced by, personal, social and cultural values and staff working with the person at risk should always reflect on how their own values might affect their judgement. Finding the right balance between respecting the adult's autonomy and meeting the duty to protect their wellbeing may involve building up a rapport with the adult to come to a better understanding about whether self-neglect or hoarding are matters for adult safeguarding or any other kind of intervention.

Crucial to all decision making is a robust risk assessment, preferably multi agency that includes the views of the adult and their personal network. The risk assessment might cover:

- Capacity and consent;
- Indications of mental health issues;

- The level of risk to the person's physical health;
- The level of risk to their overall wellbeing;
- Effects on other people's health and wellbeing;
- Serious risk of fire;
- Serious environmental risk e.g. destruction or partial destruction of accommodation.

A significant element of self-neglect and hoarding is the risk that these behaviours pose to others. This might include members of the public, family members or professionals. Partnerships may wish to invest in agreeing local procedures with the involvement of carers and service users.

#### **4.5 HEARING A DISCLOSURE**

If a vulnerable adult, child/young person says or indicates that they are being abused, or information is obtained which gives concern that a vulnerable adult, child/young person is being abused, you should follow the below guidance:

##### **RECEIVE:**

- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said and react calmly so as not to frighten the child/young person.
- Make a note of what has been said as soon as possible.

##### **REASSURE:**

- Reassure the vulnerable adult, child/young person that they have done the right thing by telling you.
- Tell the vulnerable adult, child/young person they are not to blame and that it was right to tell; I am glad you came to me.
- It is important that you do not promise to keep it a secret as your professional responsibilities may require you to report the matter. If you make this promise to a vulnerable adult, child/young person and then break it, you may erode trust between the vulnerable adult, child/young person and OETC.

##### **REACT:**

- Take what the vulnerable adult, child/young person says seriously, recognising the difficulties inherent in interpreting what is said by a vulnerable adult, child/young person who has a speech disability and/or differences in language;
- Do not ask 'leading' questions, for example 'what did they do next?' (This assumes they did!), or 'did they touch your private parts?' Such questions may invalidate your evidence (and that of the vulnerable adult, child/young person) in any later prosecution in court.

- Explain what you have to do next and whom you have to talk to.

**RECORD:**

- Make some brief notes at the time on any paper which comes to hand.
- Do not destroy your original notes in case they are required by a court.
- Record the date, time, place, persons present and any noticeable non-verbal behaviour.
- Be specific when noting the words used by the vulnerable adult, child/young person.
- Use OETC's Safeguarding Incident Report Form (see appendix 6) to ensure all the required information is recorded.

**REMEMBER:**

- To share your concerns with the Designated Safeguarding Officer immediately, or the Designated Safeguarding Ambassador in the DSO's absence, who will take the matter forward.

#### **4.6 REPORTING ALLEGATIONS, SUSPICIONS OR CONCERNS**

It is not the responsibility of anyone working at OETC to decide whether or not a vulnerable adult, child/young person is being abused or might be abused. However, there is a responsibility to act on concerns to protect vulnerable adults, children and young people in order that appropriate agencies can then make enquiries and take any necessary action to protect the vulnerable adult, child/person.

If you become aware of any issue or complaint relating to the welfare or wellbeing of vulnerable adults, children and young people, then you should raise these with the Designated Safeguarding Officer or the Designated Safeguarding Ambassador, in the DSO's absence, who will be responsible for documenting your concern on an Incident Report Form (see appendix 6). All concerns will be considered and a decision reached as to whether the concern should be referred to Child / Adult Social Services.

All Safeguarding Incident Report Forms are securely stored as restricted and protected files on Salesforce, which is OETC's CRM system.

#### **4.7 MAKING A REFERRAL TO SOCIAL SERVICES**

If a decision is made to raise a concern with Social Services it will be the responsibility of the Designated Safeguarding Officer to formally report this concern. If, for any reason, the Designated Safeguarding Officer is unable to lead on this process then the Designated Safeguarding Ambassador will make the referral.

OETC will make all referrals within 24 hours of a serious concern or disclosure coming to light. When a referral is made, OETC will record the name and role of the social services member of staff or police officer to whom the concerns were passed, together with the time and date of the call/referral.

If a concern is allayed and a decision is made not to make a referral then OETC will still be required to record details of the concern and details as to why a referral was not made. This information may become relevant later on if further concerns emerge.

## **5. ALLEGATIONS OF MISCONDUCT OR ABUSE BY STAFF**

In the event of allegations being made against an employee (staff, freelancer or volunteer), OETC has a dual responsibility in respect of both the vulnerable adult/child/young person and employee. The same person must not have responsibility for dealing with the welfare issues about vulnerable adults, children and young people and the staff employment issues.

Two separate procedures must be followed:

1. In respect of the vulnerable adult/child/young person the Designated Safeguarding Officer will lead the process related to the vulnerable adult/child/young person;
2. In respect of the staff member against whom the allegation is made the Designated Safeguarding Ambassador will lead the process related to the staff member.

With regards to the vulnerable adult/child/young person, the aforementioned process will be followed. A flowchart for allegations against staff is provided in appendix 5.

### **Allegation by a child/young person**

With regards to the staff member against whom the allegation is made, the below process will be followed if the allegation has been made by a **child/young person**:

1. OETC will make formal contact with Tower Hamlets Council who is responsible for providing instruction in the event of an allegation of abuse or suspicious behaviour made against a staff member.
2. OETC is legally required to alert the LADO (local authority designated officer) to all cases in which it is alleged that a person who works with children and young people has:
  - Behaved in a way that has harmed, or may have harmed, a child/children and/or a young person/young people;
  - Possibly committed a criminal offence against a child/children and/or a young person/young people;
  - Behaved towards a child in a way that indicates they are unsuitable for such work.
3. The LADO will instruct OETC on procedure and what information may be shared with the person who is the subject of an allegation. OETC and LADO will decide, in consultation with the Police and/or any other relevant agencies, what may be shared in situations that may possibly lead to a criminal investigation.
4. Subject to advice from the LADO, and to any consequent restrictions on the information that can be shared, OETC will, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome.

OETC should contact the LADO of where the child/young person is based. Where this is not possible, contact should be made with the Tower Hamlets LADO (the home borough of OETC's offices at 192-196 Hanbury Street, E1 5HU rooms). OETC should provide information on where the child is based, where the adult is based, and where the allegation was made in case the LADO needs to share information across multiple local authorities. Tower Hamlets LADO information is provided in appendix 1.

### **Allegation by a vulnerable adult**

Alternatively, if the allegation has been made by a **vulnerable adult**:

OETC will make formal contact with Tower Hamlets Council's Adult Safeguarding Board, notify them of the allegations made against the member of staff and follow any requirements and/or recommendations made by the Council's Adult Safeguarding Board. Subject to advice from Adult Social Services/ Safeguarding Board, and to any consequent restrictions on the information that can be shared, OETC will, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome.

In all instances OETC will seek to ensure that any staff member is treated fairly and honestly and that they are supported to understand the concerns expressed and processes involved. They will be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process.

## **6. LONE WORKING**

Legislation does not prohibit lone working, but an employee should not be put at more risk than other people working. An employer has a general duty under Section 2(1) of the Health & Safety at Work Act 1974, to ensure, so far as is reasonably practicable, the health, safety and welfare of employees whilst at work.

Where possible, OETC staff will avoid working alone with service users. In instances where this cannot be avoided, the staff member must ensure that they are protecting the service users as well as themselves.

OETC staff should avoid putting themselves in situations where they are 1:1 in taxis or personal cars with service users. Where this may be required, it should be agreed with the CEO/Participation and Operations Manager, and booked in advance using a reputable licenced company. If private transportation is required due to an emergency, a ratio of 2:1 should be met. If this is unachievable, then the CEO/Participation and Operations Manager must be informed.

If staff encounter service users outside of formal OETC sessions on public transport or by foot, then it is the responsibility of the staff member to stay in busy, well lit areas. If this occurs on public transport, then where possible the staff member should delay by boarding the next form of public transport. If possible, the staff member should look out for CCTV cameras and try to remain in view of these.

If lone working cannot be avoided, then:

- Check in with another member of staff to tell them where you are going, what you are doing, how long you will be gone, and why
- Meet in a public space, or ensure a door is left open. If this changes during the meeting, then try to move the conversation to where you are within eyesight of other parties

- If during a session, try speaking to the individual to the side of the group, out of earshot of other service users but within eyesight of your fellow facilitator
- Remain accessible to others- within earshot of another person
- Avoid unnecessary physical contact
- Ensure the meeting is not unnecessarily prolonged
- Suggest another staff member also attends the meeting and if this is declined then suggest it for future meetings
- Dynamically risk assess if they are in a safe space throughout the meeting
- Keep your mobile phone nearby, do not leave it unattended and where possible have an emergency contact on speed dial

If the situation becomes hostile/abuse, then:

- Raise the alarm to those nearby
- Remove yourself from the situation
- If there are no people in your surroundings to help, and it would not put you at greater harm, try to discreetly use your mobile phone to raise the alarm
- Report the incident where safety was compromised as a 'near miss' to allow for learning and policy changes
- Seek advice from their manager to avoid putting themselves at risk in the future
- Ensure meetings with this individual are always with another adult/OETC staff member.

## **7. COMMUNICATION WITH VULNERABLE ADULTS, CHILDREN AND YOUNG PEOPLE**

### **7.1 COMMUNICATION VIA TELEPHONE**

Staff should in no circumstances make or receive calls or texts (including WhatsApp) to or from vulnerable adults, children and young people using their personal mobile phone numbers. An OETC mobile is provided for contacting service users, children and young people. This mobile should be pin locked so that data is not accessible by others. Staff members who use the organisation mobile should, where possible, take the call in an open environment where the conversation can be witnessed. All staff who have pastoral responsibility for any service user, child or young person will be given a phone to use during the time of employment. Where possible, the use of Whatsapp between staff and service users should be avoided and communication streamlined via official OETC email channels.

## 7.2 COMMUNICATION VIA EMAIL

Staff should in no circumstances communicate with service users, children and young people using their personal email address. In all email communications staff should use formal language to avoid any misunderstanding on the part of the recipient. Staff members who have concerns regarding content of an email that they send or receive from a service user, child/young person should consult the Designated Safeguarding Officer for guidance and forward the content of the email to the DSO.

## 7.3 SOCIAL MEDIA

OETC recognises that social media can be a legitimate and effective way to network and communicate with service users, children and young people. Current social media applications frequently used by service users and staff include Twitter, Facebook, Tik Tok, LinkedIn and Instagram, to name but a few. Contact with vulnerable adults, children and young people through such forums should only take place through organisational accounts. Current organisational accounts are as follows:

<i>Application</i>	<i>Account Domain</i>	<i>Account Moderators</i>
Twitter	@OutsideTheatre <a href="https://twitter.com/OutsideTheatre">https://twitter.com/OutsideTheatre</a>	Participation and Operations Manager  Outreach and Administration Coordinator
Facebook	@Outsidedgetheatre <a href="https://www.facebook.com/Outsidedgetheatre/">https://www.facebook.com/Outsidedgetheatre/</a>	Participation and Operations Manager  Outreach and Administration Coordinator
Instagram	@outsidedge <a href="https://www.instagram.com/outsidedge/">https://www.instagram.com/outsidedge/</a>	Participation and Operations Manager  Outreach and Administration Coordinator

OETC staff, permanent or freelance, must not do any of the following on their personal social media accounts:

- Send or accept any social media friend requests from OETC service users
- Request to follow OETC members on other social media platforms
- Join, accept invitations to or contribute to any groups, private or otherwise, relating to an OETC course, production or service user activity on social media
- Send or respond to any private messages from an OETC member on social media

- Share photographs, quotes or any other content with/generated by service users without the explicit consent of OETC's Participation and Operations Manager or Artistic Director/CEO

OETC does not expect its staff to protect their personal social media accounts (thereby making sure their content is only visible to followers approved by the account holder), however, it does ask all staff to respect their association with the organisation when posting content.

## **8. PHOTOGRAPHY, VIDEO & ONLINE SAFETY**

Informed consent from Service User for photography or video recording of any vulnerable adult is obtained either through written consent or, when appropriate, through verbal consent. Parental/guardian consent for photography or video recording of any child or young person under the age of 18 is obtained through Consent forms. Photographs and videos of vulnerable adults, children and young people will be stored in a designated folder that is only accessible by designated OETC staff.

Any camera owned by the OETC and used by staff for the purpose of photographing vulnerable adults, children and young people engaged in OETC activity must have its memory wiped as soon as content has been transferred to the designated OETC folder. OETC will ensure that any professional photographers or video-makers contracted by OETC to make photos/videos are not lone-working with vulnerable adults, children and young people, and at least one member of staff with an Enhanced Disclosure and Barring Service (DBS) check which is present. OETC will announce at all performances that "Video and photography is not permitted during the performance".

From March 2020 OETC will include information about online safety for all new members taking part in our masterclasses, courses, productions or any other OETC online activity.

OETC makes annual updates to our guidelines for online safety in a format that is accessible to all.

## **9. RESIDENTIAL & OVERNIGHT ACTIVITY**

OETC's programme of work includes opportunities for vulnerable adults, children and young people to attend activities across London. In circumstances where the OETC tours with service users when OETC provides accommodation options will ensure that the following considerations are made:

- Staff members will sleep in separate but nearby quarters.
- Where bedroom, bathroom or toilet facilities are shared, service users will be placed in accommodation of the same gender (where appropriate).
- Where single room, en-suite accommodation is provided, service users may be placed in accommodation of mixed gender (where appropriate).
- A member of pastoral staff is available on call.

## 10. DISCLOSURE AND BARRING SERVICE (DBS) CHECKS

### 10.1 CHECK LEVELS

The Disclosure and Barring Service (DBS) exists to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including vulnerable adults, children and young people. A DBS check forms one part of the wider safeguarding process. It helps organisations to determine whether a person is a suitable candidate for a particular role by providing information about their criminal history.

Disclosure and Barring Service (DBS) disclosures are required for any staff member (paid or unpaid) who will be working in a regulated activity. For most of OETC's work the only relevant regulated activity is unsupervised activities with vulnerable adults, children and young people: to teach, train, instruct, or supervise, or provide advice/guidance on well-being. This work is Regulated Activity only if done regularly or intensively, which means being carried out by the same person frequently (once and week or more often), or on 4 or more days in a 30-day period. A person who manages or supervises a regulated activity is also counted as undertaking a regulated activity. If the person is providing occasional or temporary services they are not in a Regulated Activity.

Before an organisation considers asking a person to apply for a criminal record check through DBS, they are legally responsible for ensuring that they are entitled to submit an application for the job role. There are currently three levels of check:

1. **Standard checks** reveal information relating to spent and unspent convictions, cautions, reprimands and final warnings from the Police National Computer (PNC). To be eligible for a Standard Check the position must be specified in the Exceptions Order to the Rehabilitation of Offenders Act 1974.

2. **Enhanced checks** reveal the same information as Standard Checks but also check against information held by local police forces (for instance, relevant on-going investigations). To be eligible for an Enhanced Check the position must be specified in the Exceptions Order to the Rehabilitation of Offenders Act 1974 AND regulations made under the Police Act 1997, which includes work with children.

3. **Enhanced checks (with barred list)** are used to check against lists of people prohibited from working with children and vulnerable adults. These are known as 'barred lists' (see below). To be eligible for an Enhanced and Adult/Child Barred list(s) check the position must meet the above criteria and fall within the DBS definition of 'Regulated Activity' (see below).

### 10.2 REGULATED ACTIVITY DEFINITION

Regulated Activity is work a person who appears on the DBS barred lists is prohibited from doing. This includes work that involves close and unsupervised contact with vulnerable groups, including children.

The DBS has recently reduced the scope of Regulated Activity, so that some roles that previously needed a barred list check no longer do so. However, those posts taken out of Regulated Activity remain eligible for Enhanced Checks. In reducing the scope there is now a greater role for organisations in deciding whether a

a person is a suitable candidate for a particular role. To do this effectively they must also use other safeguarding measures rather than rely on legal provisions alone.

Activities that place a staff member in Regulated Activity with vulnerable adults, children and young people are:

I. *Unsupervised activities*: teach, train, instruct, care for or supervise vulnerable adults children or young people, or provide advice/guidance on well-being, or drive a vehicle only for vulnerable adults, children or young people;

II. *Work for a limited range of establishments ('specified places')*, with opportunity for contact: for example, care homes, schools, children's homes, childcare premises. Not work by supervised volunteers.

III. *Relevant personal care*, for example washing or dressing; or health care by or supervised by a professional, even if done once.

IV. *Registered childminding*; and foster-carers.

Work under (i) or (ii) is Regulated Activity only if done regularly. 'Regularly' means carried out by the same person frequently (once a week or more) or on four or more days in a 30-day period (or in some cases overnight). Activity under (iii) and (iv) does not have a frequency restriction and is Regulated Activity even if performed only once.

Broadly speaking, the new definition of Regulated Activity relating to vulnerable adults and children no longer includes certain activities done on an irregular or ad-hoc basis or some activities properly supervised by someone who themselves is in Regulated Activity.

## APPENDIX 1 – CONTACT DETAILS

Role	Postholder	Email Address
CEO and Artistic Director of OETC	Matt Steinberg	matt.steinberg@outsideedge.org
Lead Trustee for Safeguarding Safeguarding Protected email	Teresa Wirz (Trustee)	safeguarding@outsideedge.org
The Safeguarding Team		safeguarding@outsideedge.org
Designated Safeguarding Officer	Adam Line (Participation and Operations Manager)	adam.line@outsideedge.org
Designated Safeguarding Ambassador	Matt Steinberg (CEO and AD of OETC)	matt.steinberg@outsideedge.org

Safeguarding Key Contacts	Contact number
Tower Hamlets Connect Helpline Team (Vulnerable Adults) (Monday to Friday 9am-5pm)	0300 303 6070 enquiry@towerhamletsconnect.org
Tower Hamlets Connect Helpline Team (Vulnerable Adults)- Out of Hours team (5pm to 9am, Weekends and Bank Holidays)	020 7364 4079
Safeguarding Adults and Mental Capacity Act team	020 8547 2019 dols@towerhamlets.gov.uk
Tower Hamlets Local Authority Designated Officer (Child LADO)- Melanie Benzie (Monday to Friday 9am-5pm)	020 7364 0677 07903 238827 LADO@towerhamlets.gov.uk
Tower Hamlets Multi-Agency Safeguarding Hub (MASH) (Monday to Friday 9am-5pm)	020 7364 3444 / 5601 / 5606
Tower Hamlets Children's Social Care Emergency Out of Hours Duty Team- Out of hours Team	020 7364 5006 (Select option 3)
Tower Hamlets, Newham & Waltham Forest Designated Safeguarding Professionals – Adults & Children- (Safeguarding lead within the ICB)	<a href="mailto:nelondonicb.tnwsafeguardingteam@nhs.net">nelondonicb.tnwsafeguardingteam@nhs.net</a>

Tower Hamlets Community Health Teams- Adult Services Single Point of Access Referrals	<a href="mailto:thgpcg.spa@nhs.net">thgpcg.spa@nhs.net</a> 0300 0335 000
Mind in Tower Hamlets, Newham and Redbridge	info@mindthnr.org.uk 0207 510 1081
Tower Hamlets Mental Health Crisis Line (24 hour)	0800 073 0003
NSPCC Helpline (child)	help@nspcc.org.uk 0808 800 5000



<https://democracy.towerhamlets.gov.uk/documents/s204534/>

## **APPENDIX 2 - CODE OF CONDUCT FOR STAFF, VOLUNTEERS AND TRUSTEES**

All staff, volunteers and trustees will be expected to be aware of and follow OETC's Safeguarding Policy and Operational Procedures.

All staff, volunteers and trustees will be expected to adhere to the below code of conduct.

### **Staff, volunteers and trustees will ALWAYS:**

- Treat everyone with dignity and respect.
- Set an example you would wish others to follow.
- Treat all vulnerable adults, children and young people equally.
- Plan activities that involve more than one other person being present, or in sight/hearing of others.
- Follow recommended ratios between adults and children/young people for meetings and activities.
- Respect an adult's, child/young person's right to personal privacy.
- Avoid unacceptable situations within a relationship of trust.
- Allow vulnerable adults, children and young people to talk about any concerns they may have.
- Remember someone else might misinterpret your actions, no matter how well intentioned.
- Take any allegations or concerns of abuse seriously and refer immediately.

### **Staff, volunteers and trustees will NEVER:**

- Form a relationship with a vulnerable adult, child/young person that is an abuse of trust.
- Engage in inappropriate behaviour or contact - physical, verbal, sexual.
- Make suggestive remarks or threats to a vulnerable adult, child/young person.
- Use inappropriate language – writing, phoning, email or internet.
- Let allegations, suspicions, or concerns about abuse go unreported.
- Accept gifts or any other form of remuneration from service users.

### **On occasion, one-to-one contact will be unavoidable, in such cases:**

- Make sure it is for as short a time as possible.

- Ensure you remain accessible to others.
- Tell someone where you are going, what you are doing and why.
- Try to move with the vulnerable adult, child/young person to areas where there are more people.
- Try to avoid unnecessary physical contact.

Following the termination of the contract and the freelance relationship with OETC, the contractor shall not, directly or indirectly, disclose to any person, firm or corporation the names or addresses of any of the customers or clients or service users of OETC or any other information pertaining to them without the prior consent of the OETC. Neither shall the contractor call on, solicit, take away, or attempt to call on, solicit, or take away any customer or client or service user information of the Company.

## **APPENDIX 3 - DEFINITIONS & SIGNS OF ABUSE**

In order to effectively protect vulnerable adults children and young people, staff should be familiar with the key signs and indicators of abuse, which are detailed below:

### **PHYSICAL ABUSE**

***Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child/young person.***

An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury. A delay in seeking medical treatment for a child/young person when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on vulnerable adults, children and young people with different skin tones or from different racial groups and specialist advice may need to be taken. Patterns of bruising that are suggestive of physical abuse include:

- Bruises that are seen away from bony prominences;
- Bruises to the face, back, stomach, arms, buttocks, ears and hands;
- Multiple bruises in clusters;
- Multiple bruises of uniform shape;
- Bruises that carry the imprint of an implement;
- Cigarette burns;
- Adult bite marks;
- Scalds.

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any vulnerable adult, child/young person who

has unexplained signs of pain or illness should be seen promptly by a doctor. Behaviour changes can also indicate physical abuse:

- Fear of parents being approached for an explanation;
- Aggressive behaviour or severe temper outbursts;
- Flinching when approached or touched;
- Reluctance to get changed, for example wearing long sleeves in hot weather;
- Depression; or withdrawn behaviour;
- Running away from home.

## **EMOTIONAL ABUSE**

***Emotional abuse happens where there is a relationship between a carer and a child/young person and can manifest in the vulnerable adult or child/young person's behaviour or physical functioning.***

Emotional abuse can be difficult to measure, and often vulnerable adults, children or young people who appear well-cared for may be emotionally abused by being taunted, put down or belittled. Emotional abuse can also take the form of vulnerable adults, children and young people not being allowed to mix/play with other vulnerable adults, children and young people. The physical signs of emotional abuse may include:

- Failure to thrive or grow;
- Sudden speech disorders;
- Developmental delay, either in terms of physical or emotional progress.
- Changes in behaviour which can also indicate emotional abuse include:
- Neurotic behaviour, e.g., sulking, hair twisting, rocking;
- Being unable to play; or fear of making mistakes;
- Fear of parent being approached regarding their behaviour;
- Self-harm.

## **SEXUAL ABUSE**

***Sexual abuse involves the use of a vulnerable adult or child/young person for gratification or sexual arousal by a person for themselves or others.***

Adults who use children, young people and/or vulnerable adults to meet their own sexual needs abuse people of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the behaviour of children/young people/vulnerable adults which may cause you to become concerned,

although physical signs can also be present. In all cases children/young people/vulnerable adults who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously. The physical signs of sexual abuse include:

- Pain or itching in the genital/anal areas;
- Bruising or bleeding near genital/anal areas;
- Sexually transmitted disease; vaginal discharge or infection;
- Stomach pains;
- Discomfort when walking or sitting down.

The following changes in behaviour may also indicate sexual abuse:

- Sudden or unexplained changes in behaviour (e.g. becoming aggressive or withdrawn);
- Fear of being left with a specific person or group of people;
- Sexual knowledge which is beyond their age or developmental level;
- Self-harm or mutilation, sometimes leading to suicide attempts;
- Suddenly having unexplained sources of money;
- Acting in a sexually explicit way towards adults;
- Sexual drawings or language.

## **NEGLECT**

***Neglect results in a vulnerable adult or child/young person suffering significant harm or impairment of development as a result of being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, or medical care.***

Neglect can be a very difficult form of abuse to recognise. The physical signs of neglect may include:

- Hunger, sometimes stealing food from others;
- Constantly dirty or smelly;
- Loss of weight, or being constantly underweight;
- Inappropriate dress for the conditions.

## **BULLYING**

***Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It's usually repeated over a long period of time and can hurt a vulnerable adult or child/ young person both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying.***

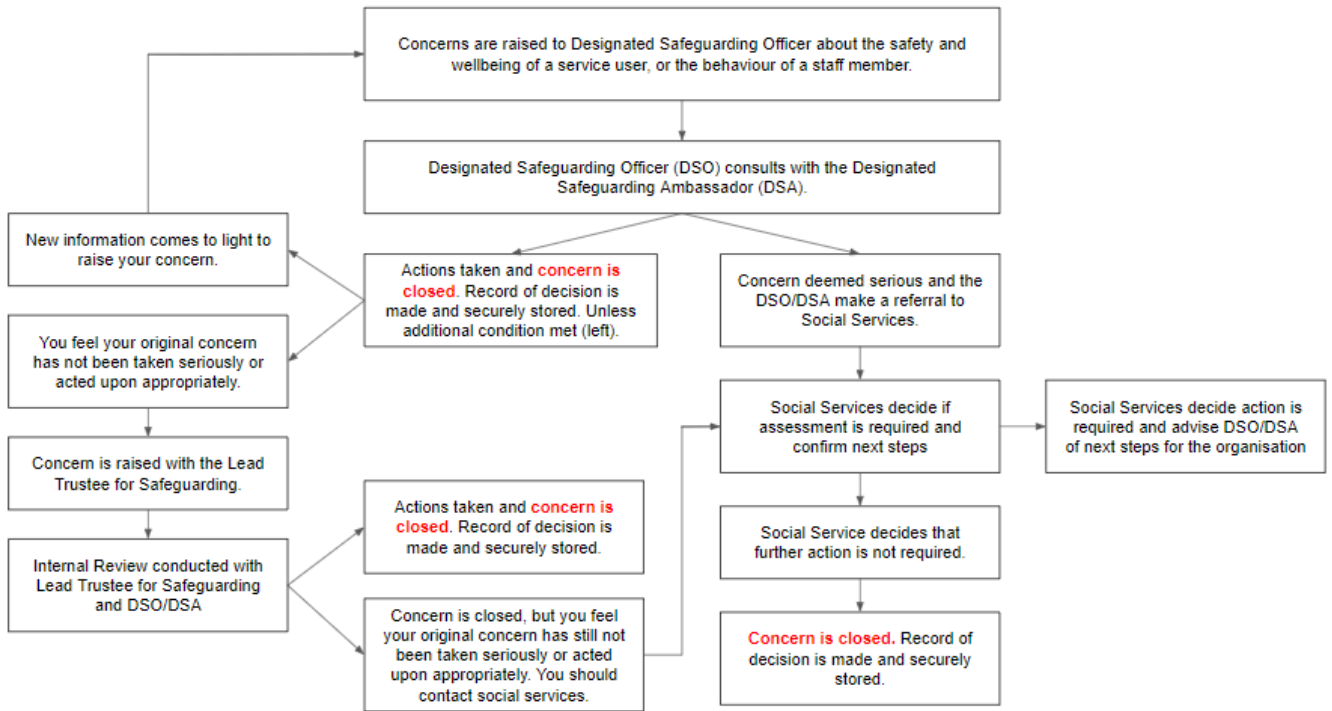
You can't always see the signs of bullying. And no one sign indicates for certain that a vulnerable adult or child is being bullied. But you should look out for:

- belongings getting "lost" or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

# APPENDIX 4 –REPORTING PROCEDURES FLOWCHART

This quick guide flowchart is designed to advise on the most appropriate action to be taken if you suspect abuse, poor practice or breach of the code of conduct:

APPENDIX 4 –REPORTING PROCEDURES FLOWCHART



## **APPENDIX 5 – REPORTING FLOWCHART FOR ALLEGATIONS MADE AGAINST STAFF**

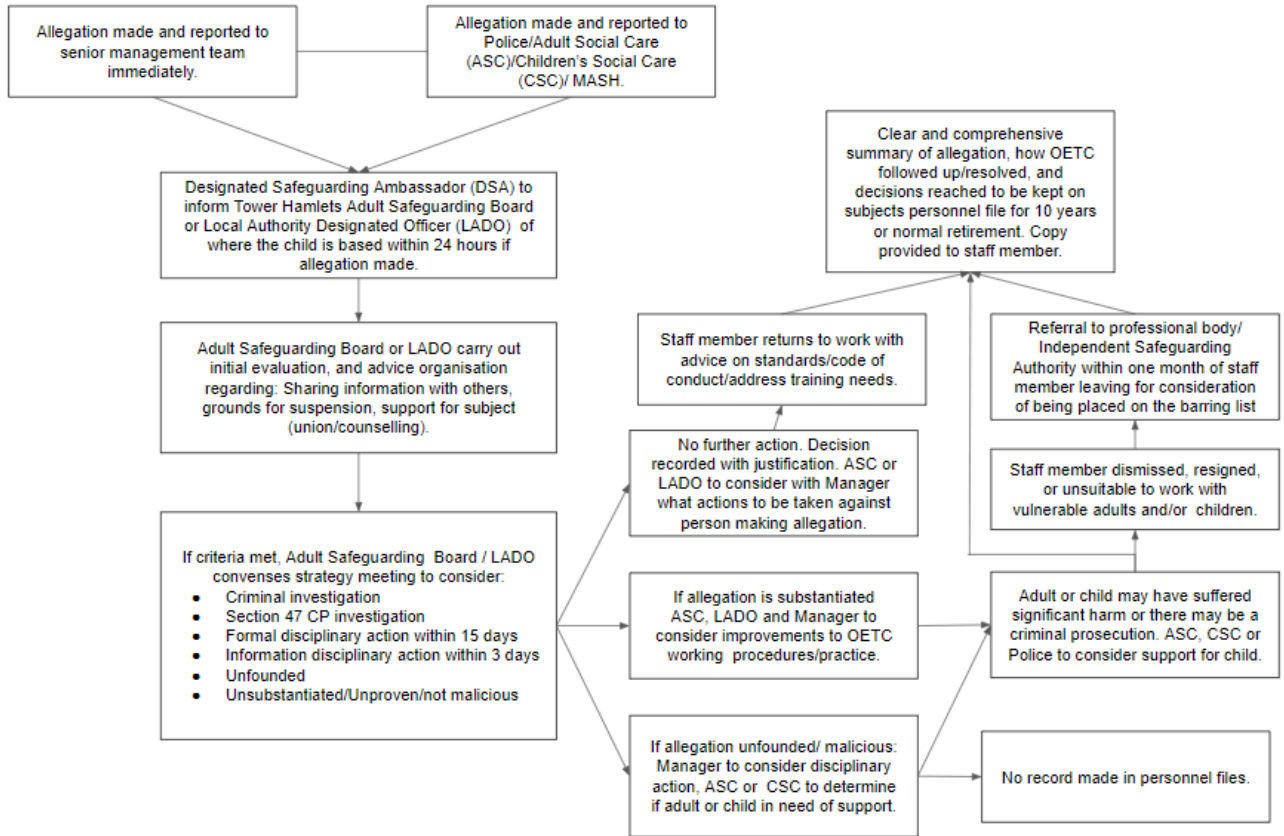
There is no Adult LADO process in Tower Hamlets; therefore, the Designated Safeguarding Ambassador (DSA) will be responsible for informing the Tower Hamlets Adult Safeguarding Board within 24 hours of being made aware of the allegation against a member of staff.

When working with young people, each local authority has a Local Authority Designated Officer (LADO). All allegations of abuse against children must be taken seriously, and the LADO should be alerted to all incidents where a person has allegedly:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

*Working Together to Safeguard Children 2018*

APPENDIX 5 – REPORTING FLOW CHART FOR ALLEGATIONS MADE AGAINST STAFF



## APPENDIX 6 – SAFEGUARDING INCIDENT REPORT TEMPLATE -

Report to be submitted to OETC's Designated Safeguarding Officer and/or Ambassador

<b>YOUR DETAILS</b>	
Your name:	
Your role:	
Date/time report completed:	
<b>ADULT / CHILD/ YOUNG PERSON MAKING DISCLOSURE DETAILS ( details may be available internally)</b>	
Name:	
Address:	
Date of birth:	
<b>INCIDENT/DISCLOSURE DETAILS</b>	
Date/time of incident or disclosure & names of other people present:	
Information regarding the nature of the allegation/ disclosure e.g. location, type of disclosure, relationship to person making disclosure, method of disclosure.	
Concise account of what was said by the victim, using their own words.	
Description of any injuries sustained	
Date passed to OETC Designated Safeguarding Officer/ Ambassador	
<b>EXTERNAL AGENCIES CONTACTED (for DSA or DSO to fill in)</b>	
Police – Details of name of contact and advice received:	

Social Services – Details of name of contact and advice received:	
Other - Details of name of contact and advice received:	

**APPENDIX 7 – REFERENCE FORM FOR POSTS REQUIRING ACCESS TO VULNERABLE ADULTS, CHILDREN AND YOUNG PEOPLE**

This reference is for:	
Post offered:	
Please confirm employment dates:	From:  To:
The applicant's most recent job title:	
Main duties/responsibilities of the post:	

Reason for leaving employment:	
How long have you known the applicant?	

Does the candidate perform their duties satisfactorily?	Yes • No •
If no please provide details of any areas needing improvement:	
Please confirm the how many days sickness absence the applicant has had in the last 24 months:	
Can you think of any reason why this person might not be suitable for the above role?	
Please comment on the effectiveness of the applicants interactions with vulnerable adults, children and young people:	
Are you completely satisfied that the applicant is suitable to work with vulnerable adults, children and young people? If no please provide details:	Yes • No •

<p>To the best of your knowledge has the applicant had an allegation made against them regarding their behaviour towards vulnerable adults, children and young people?</p>	<p>Yes • No •</p> <p>If yes please give details:</p>
<p>Has the applicant been subject to any disciplinary action relating to their suitability to work with vulnerable adults, children and young people in which penalties were imposed?</p>	<p>Yes • No •</p> <p>If yes please give details:</p>
<p>Would you re-employ the applicant?</p>	<p>Yes • No •</p> <p>If no please give details:</p>

<p>Has the DBS check been carried out by your organisation?</p>	<p>Yes • No •</p> <p>If yes please state when:</p>
<p>Please state whether you would recommend this candidate for the post without reservation:</p>	
<p>Printed name</p>	

Signature	
Position	
Organisation name	
Date	

**Please return the reference by email using a recognised employer's email and making sure that you include the organisation's logo on the email.**

## **APPENDIX 8 – Appropriate language, Personal space, Work and home, Collusion, Modelling behaviour, Confidentiality, Gifts, loaning and borrowing**

Based off of *Safeguarding: Maintaining professional boundaries, a head teacher update 2016*.

### **Appropriate language**

You can and should develop good strong trusting relationships with the Service Users that you engage with, but you are not forming “friendships” with them. On this basis always be thoughtful about the language that you might be using. Sensitive thought and challenge should be explored in relation to inappropriate language or terms. Examples to avoid include:

- Use of inappropriate names or terms of endearment.
- Inappropriate conversation or enquiries of a sexual nature.
- Inappropriate comments about either party’s appearance, including excessive flattering or personal criticism.
- Disrespectful or discriminatory treatment of, or manner towards, young people based on their perceived or actual sexual orientation.
- Humiliation, profanity or vilification.
- Suggestive humour, “banter”, jokes or innuendo of a sexual nature.
- Obscene or inappropriate gestures and language.
- Names such as buddy, mate, pal, friend and so on may give confusing messages.

### **Personal space**

Respect the personal space and privacy of all Service Users. Remember that vulnerable adults, children and young people can read different interpretations into our actions. It is also very easy for these situations to escalate if we are not sensitively, proactively and dynamically challenging and managing boundaries. The exception to this will always be related to safeguarding and the safe management of risk. Examples to avoid:

- Unwarranted or unwanted touching of a Service User personally or with objects (e.g. pencil, book, ruler etc).
- Corporal punishment (physical discipline, pushing, shoving, smacking).
- Initiating, permitting or requesting inappropriate or unnecessary physical contact with a Service User (hugs, kisses, tickling, play fighting) or facilitating situations which unnecessarily result in close physical contact.

## **Work and home**

Work and home or the personal and the professional should be held separately. Remaining “in role” at all times minimises the likelihood of false, or unfounded allegation and ensures that professional codes of conduct are adhered to. Examples to avoid:

- Inviting, allowing or encouraging Service Users to meet you outside of your working dynamic.
- Allowing members to access a staff member’s personal internet locations and personal devices (e.g. social networking sites).
- Attending Service Users accommodation or their social gatherings.
- Being alone with a Service User outside of a staff member’s responsibilities unless agreed by a senior member of staff.
- Entering changing rooms or toilets occupied by Service Users when supervision is not required or appropriate or using toilet facilities allocated to Children or Young People. Undressing using facilities set aside for Service Users, or in their presence.
- Transporting a Service User unaccompanied without prior permission.
- One-to-one tutoring, mentoring, or coaching of Service Users without the prior agreement.
- Giving personal gifts or special favours.
- Singling the same Service Users out for special duties or responsibilities.

## **Collusion**

Be careful not to collude with members. Be aware that vulnerable adults, children and young people can draw adults into conversations and situations. We should always remain within the boundaries of our professional role.

## **Modelling behaviour**

Challenge anti-discriminatory language/jokes. We are role models to the members that we work with, and it is important that we promote and respect difference. We also have a responsibility to challenge negative ideas, assumptions, behaviour and language whenever it occurs. This is how Service Users will be encouraged to learn new ways of thinking about themselves and others.

## **Confidentiality**

Avoid discussing information regarding other OETC Service Users or members of staff. Be aware of being overheard while on your mobile phone or talking to other staff.

## **Gifts, loaning and borrowing**

Avoid giving Service Users gifts and lending or borrowing items. There are issues of power, control and equality involved in these areas. Service Users should be discouraged from offering gifts to staff.

### Policy Document and Version Control:

Status: Approved

Approval Date: 15 May 2023

Revision Date: 01 November 2025

Review Date: May 2026

Author: Collaboratively created between Matt Steinberg, Emily Doherty and Hannah Stacey

Summary of key changes:

- Update Designated Safeguarding Officer to Adam Line